

27.085 SKF AUTOMOTIVE

JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY  
ST. LOUIS REGIONAL OFFICE

10805 Sunset Office Drive, Suite 100  
St. Louis, MO 63127-1017  
314-822-0101  
Fax No. 314-822-0943

May 14, 1991

Mr. C. William McGlocklin  
Corporate Environmental Manager  
SKF USA, Inc.  
1100 First Avenue  
King of Prussia, PA 19406-1352

L.O.W. #91-SL.024

Dear Mr. McGlocklin:

Enclosed, please find a report of a hazardous waste management inspection conducted at SKF Automotive Products by Mr. Bob Carlson of my staff on April 23, 1991.

Please note that the section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection, and the "RECOMMENDATIONS" section outlines steps the inspector has determined will correct those violations.

In order to document that corrective actions have been taken, you are requested to submit a written response no later than June 21, 1991. The response should describe the steps taken to correct each of the unsatisfactory features identified. Please direct the response to Mr. Carlson. You should also forward a copy of your response and supporting documentation to Mr. Bruce Martin, Chief - Hazardous Waste Enforcement, Waste Management Program, P. O. Box 176, Jefferson City, MO 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.

Should you have any questions, or wish to confer in this matter, please contact Mr. Carlson.

Sincerely,

ST. LOUIS REGIONAL OFFICE

*Robert S. P. Eck*  
Robert S. P. Eck  
Regional Administrator

RSPE/BC:ps

Enclosure

cc: Waste Management Program - Enforcement  
Mr. Don Kerns, WMP - Permits

WMP-Enforcement

Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

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WASTE MANAGEMENT PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES



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RESOURCE CONSERVATION AND RECOVERY ACT  
AND  
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW  
COMPLIANCE EVALUATION INSPECTION REPORT

Facility

SKF Automotive Products  
2320 Marconi Avenue  
St. Louis, MO 63110

EPA ID #: MOT300010345  
MO Generator ID: 01115

Participants

Department of Natural Resources  
(MDNR)

Mr. Bob Carlson  
Environmental Specialist  
St. Louis Regional Office

Introduction

An inspection of SKF Automotive Products, located at the above address, was conducted on April 23, 1991. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended. The inspection was confined to facets of the operation relevant to hazardous waste management.

Facility Description

The Marconi Avenue SKF facility has been closed since July, 1986, and the property was sold soon afterward. The current occupants of the different buildings have not changed since Mr. Kerwin Singleton's report of March 17, 1989. Building # 1 is still vacant, and possibly Building # 3 also, as no waste materials could be viewed through the windows.

The facility repeatedly requested a reclassification from interim status to generator only, in letters sent over several years. This was achieved for the SKF Foundry in Washington, Missouri, but not for the St. Louis facility. Various company representatives certified in letters to EPA Region VII and the MDNR Waste Management Program (WMP) that the facility had not used its interim status. However, Mr. Gaurang Shah's inspection report of September 10, 1984, indicated that hazardous waste had been stored for over 90 days, which would constitute use of interim status. This information was attributed to statements made by facility representatives during the inspection.

Until a decision is made by the WMP whether or not to cancel the facility's interim status, the requirements under 40 CFR 265 as incorporated in 10 CSR 25-7.265 still apply.

**HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY  
Interim Status Checklist**

Form IS-INSP  
(10-15-88)

Name of Facility: SKF Automotive Products Date: 4-23-91  
 Off-Site Facility?   y   n I.S. for:                       
 Address: 2320 Marconi Avenue Other Inspections Done:  
St. Louis, MO 63110 RR    TRANS    LDR     
 OTHER                       
 Phone: (    ) N/A MO ID# 01115 EPA ID# MO T300010345  
 Facility Representative: N/A Title: N/A

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

facility has been closed since 1986, but issues of  
proper closure + financial assurance documentation.  
At issue is whether SKF ever actually made use of its  
interim status by storing hazardous waste over 90 days.  
No changes since Kerwin Singleton's 12-13-88 inspection were noted.

List of wastes generated. (Use continuation sheet, if needed.) <sup>↑ report dated 3-17-89</sup>

	Waste	Amount/Month	Disposition
1.	<u>N/A</u>		
2.			
3.			
4.			
5.			

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- |   |   |
|---|---|
| <p><u>N/A</u></p> <p>A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND (D)</p> <p>Generator's MO and EPA I.D. Numbers. . . . . ( )</p> <p>Manifest document number (MO I.D. &amp; Shipment #). . . . . ( )</p> <p>EPA Waste I.D. codes . . . . . ( )</p> <p>Generator's name, address, phone # . . . . . ( )</p> <p>All Transporters' names, phone #'s, MO and EPA I.D. #'s. . . . . ( )</p> <p>Designated facility name, address, phone # and MO and EPA I.D. # . . . . . ( )</p> <p>Proper DOT Shipping Name, Hazard Class and I.D. # . . . . . ( )</p> <p>Containers, Quantity and Unit Wt/Vol being shipped properly designated . ( )</p> <p>Proper certification including waste minimization. . . . . ( )</p> <p>Manifest properly signed and dated . . . . . ( )</p> <p>No more than 10 days time between generator and facility signatures. . . ( )</p> <p>Manifests returned within 35 days. . . . . ( )</p> <p>If not, exception generator report submitted within 45 days. . . . . ( )</p> <p>Completed manifests and Summary Manifest Report and Certification. . . ( )</p> <p>Spills of reportable quantities reported to DNR. . . . . ( )</p> | <p><u>N/A</u></p> <p>B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)1</p> <p>Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. . . . . ( )</p> <p>Placards available for use by transporters . . . . . ( )</p> <p>Satellite accumulation requirements met (if applicable). . . . . ( )</p> <p>a. Stored in satellite areas less than 1 year. . . . . ( )</p> <p>b. Containers marked identifying contents and beginning date . . . . . ( )</p> <p>c. Containers kept closed/compatible/good condition. . . . . ( )</p> <p>d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely hx. waste). . . . . ( )</p> <p><u>N/A</u></p> <p>C. WASTE ANALYSIS 10 CSR 25-7.265(2) AND 7.264(2)(B)</p> <p>Waste analysis plan. . . . . ( )</p> <p>Identify hazardous wastes handled at facility. . . . . ( )</p> <p>Means to confirm wastes received from off-site . . . . . ( )</p> <p>D. SECURITY 10 CSR 25-7.263(1) AND 7.265(2)(B)</p> <p>24-hour surveillance system at facility or An artificial or natural boundary/controlled access. . . . . ( )</p> <p>Restricted access sign posted at each entrance . . . . . ( )</p> <p>Legible from a distance of 25 feet . . . . . ( )</p> |
|---|---|

Briefly describe waste streams managed at each TSD process.

<u>Waste</u>	<u>Amount/month</u>	<u>Process</u>	<u>Design Capacity</u>
<u>N/A</u>			

- N/A
- E. GENERAL INSPECTION 10 CSR 25-7.265(2) AND 7.265(2)(B)
- Facility inspected and maintained. . . . . ( )
  - Inspection log and written schedule for inspecting . . . . . ( )
  - Inspect emergency equipment. . . . . ( )
  - Inspect security devices . . . . . ( )
  - Inspect operating and structural equipment . . . . . ( )
- N/A
- F. PERSONNEL TRAINING 10 CSR 25-7.265(2) AND 7.265(2)(B)
- Documentation of hazardous waste director's qualifications or training ( )
  - Completed classroom or on-the-job training . . . . . ( )
  - Job title, description, and name of person filling position. . . . . ( )
  - Written record of the type and amount of training given. . . . . ( )
  - Documentation confirming that training has been given. . . . . ( )
- N/A
- G. PREPAREDNESS AND PREVENTION 10 CSR 25-7.265(2) AND 7.265(2)(C)
- Internal communication or alarm system . . . . . ( )
  - Device in the hazardous waste operation area capable of summoning emergency assistance . . . . . ( )
  - Fire control, spill control, and decontamination equipment available . . . . . ( )
  - Adequate water supply for fire control equipment . . . . . ( )
  - Adequate and proper safety equipment available . . . . . ( )
  - Adequate aisle space . . . . . ( )
  - Arrangements with local emergency agencies . . . . . ( )
- N/A
- H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-7.265(2) AND 7.265(2)(D)
- Contingency plan . . . . . ( )
  - Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste . . . . . ( )
  - Describe formal arrangements with emergency agencies . . . . . ( )
  - Names, addresses and phone numbers (home & office) of emergency coordinators . . . . . ( )
  - Emergency equipment including its description and location . . . . . ( )
  - Evacuation plan if applicable. . . . . ( )
- N/A
- I. WASTE OIL 10 CSR 25-11.010
- Waste oil properly handled . . . . . ( )
  - Written waste oil contract maintained. . . . . ( )
- N/A
- J. MANIFEST, RECORDS, REPORTING 10 CSR 25-7.265(2) AND 7.265(2)(E)
- For off-site facilities
- Manifests signed and dated . . . . . ( )
  - Copy to transporter. . . . . ( )
  - Copy to generator in 30 days . . . . . ( )
  - Copy at facility for 3 years . . . . . ( )
- Operating record
- Description, quantity, and TSD process for all hazardous wastes. . . . . ( )
  - Location and quantity of all hazardous waste . . . . . ( )
  - Waste analysis records from off-site sources . . . . . ( )
  - Summary and description of emergency incidents . . . . . ( )
  - Record of inspections. . . . . ( )
  - Monitoring, testing and analytical results if necessary. . . . . ( )
- Reporting
- Unmanifested waste reports for off-site facilities . . . . . ( )
  - Reports for emergencies, spills, closure . . . . . ( )
- K. INTERIM STATUS CONTAINERS 10 CSR 25-7.265(2) AND 7.265(2)(I)
- Containers closed and in good condition. . . . . ( )
  - Containers made of materials compatible with hazardous wastes placed in them . . . . . ( )
  - Hazardous waste containers storage area inspected once a week. . . . . ( )
  - Inspection log . . . . . ( )
  - Containers holding ignitable or reactive waste at least 50 ft. from the property line. . . . . ( )
  - Incompatible waste placed in different containers. . . . . ( )
  - Are storage containers holding hazardous waste which are incompatible with nearby materials separated by dikes, berms, walls, or other devices. . . . . ( )
  - Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-7.265(2)(I). . . . . ( )
- N/A
- L. INTERIM STATUS TANKS - 10 CSR 25-7.265(2) AND 7.265(2)(J)
- (See Tank Checklist)
- N/A
- M. INTERIM STATUS SURFACE IMPOUNDMENTS 10 CSR 25-7.265(2) AND 7.265(2)(K)
- 2 ft. of freeboard in surface impoundment. . . . . ( )
  - Earthen dikes have protective covers . . . . . ( )
  - New additions, replacements, or expansions of existing surface impoundments designated with double liner and leachate system . . . . . ( )
  - Waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment . . . . . ( )
  - Freeboard level inspected each operating day . . . . . ( )
  - Dikes & vegetation inspected weekly for leaks, deterioration or failures ( )
  - Inspections recorded in inspection logs. . . . . ( )
  - Waste treated, rendered or mixed so that mixture no longer meets the definition of ignitable or reactive. . . . . ( )
  - Incompatible wastes segregated in separate surface impoundments. . . . . ( )

N. GROUNDWATER MONITORING 10 CSR 25-7.265(2) AND 7.265(2)(F)  
Applicable to surface impoundments, landfills and landfarms

N/A

Groundwater monitoring wells installed . . . . . ( )  
Wells are structurally sound . . . . . ( )  
Sampling and analysis plan on-site . . . . . ( )  
Samples and groundwater levels taken . . . . . ( )  
Groundwater monitoring results kept. . . . . ( )

O. CLOSURE AND POST-CLOSURE 10 CSR 25-7.265(2) AND 7.265(2)(G)

Closure plan for facility. . . . . ( )  
Description of how and when facility will be closed. . . . . ( )  
Estimate of maximum inventory of hazardous waste . . . . . ( )  
Steps to decontaminate equipment . . . . . ( )  
Post-closure plan for disposal facilities only . . . . . ( )

P. FINANCIAL REQUIREMENTS 10 CSR 25-7.265(2) AND 7.265(2)(H)

Cost estimate for facility closure . . . . . ( )  
Financial assurance for closure and post-closure . . . . . ( )  
Liability for sudden accidents . . . . . ( )  
Liability for non-sudden accidents for disposal only . . . . . ( )

COMMENTS: referred to Don Kerns, WMP permit section,  
for review.

Inspector Signature & Title: MTLW EST

Office: SLRD

IN COMPLIANCE (✓)  
IN VIOLATION OR  
ABSENT (—)